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April 17, 2024

VIA ECF ONLY

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, NY 10007

SO ORDERED

/s/ Alvin K. Hellerstein
U.S.D.J.
April 22, 2024

Re: *Hachette Filipacchi Presse v. Prestige International Group LLC*, Civil Action
No. 1:23-cv-04777-AKH
Letter Requesting Extension of Time to File Default Judgment Motion

Dear Judge Hellerstein:

We represent Plaintiff Hachette Filipacchi Presse (“Plaintiff”) in the above-captioned case, and are writing, pursuant to Your Honor’s Individual Rule 1(D), to request a further extension of ninety (90) days to file any default judgment motion against Defendant Prestige International Group LLC (“Defendant”) (i.e., from April 30, 2024 up to and including July 29, 2024). In a letter dated October 5, 2023, Plaintiff initially advised the Court that it would move for a default judgment against Defendant by January 3, 2024. *Dkt. No. 14*. Since Plaintiff’s counsel had been corresponding with Defendant in an attempt resolve the case, Plaintiff requested an extension of time to file for a default judgment until March 1, 2024, which was granted by the Court. *Dkt. Nos. 16-17*. In light of Plaintiff’s continued efforts to discuss the case with Defendant, Plaintiff sought a second extension of time to file for a default judgment until April 30, 2024, which was likewise granted by the Court. *Dkt. Nos. 18-19*. Since then, Plaintiff has continued to make a concerted effort to contact Defendant in an attempt to reach an out-of-court resolution, and requires more time to see if any such resolution is feasible. As such, Plaintiff hereby respectfully submits that a further ninety (90) day extension of its time to file for any default judgment is warranted. As noted herein, this is Plaintiff’s third request for an extension. Plaintiff also previously filed one adjournment request regarding the initial pretrial conference, which was granted. Defendant is in default (*see Dkt. No. 13*) and therefore, Plaintiff has not conferred with Defendant regarding this request. No schedule has been entered in this case, and as such, no other deadlines will be impacted by the proposed extension.

We thank the Court for its time and consideration.

Respectfully submitted,

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